

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

WESTERN DIVISION

ESTATE OF JOSE R. FELICIANO,)
By and through Jose L. Feliciano and)
Migdalia Rosado, as Administrators of)
The Estate of Jose R Feliciano,)
Plaintiff)

vs.)

Civil No. 03-30.308-MAP

KEVIN A. MILES,)
LEROY HOLDING COMPANY, INC.,)
and SLC TRANSPORTS, INC.,)
Defendants)

PLAINTIFF'S PROPOSED JURY VOIR DIRE QUESTIONNAIRE

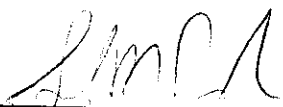
NOW COMES the Plaintiff, the Estate of Jose R. Feliciano, in the above-entitled action and hereby requests this Honorable Court to provide potential jurors with the following questionnaire, or, in the alternative, ask the following questions to all potential jurors:

1. The Plaintiffs in this case are Jose L. Feliciano and Migdalia Rosado who are the representatives of their deceased son's estate, known as the Estate of Jose R. Feliciano. The Defendants in this case are Kevin Miles from New York State, and two corporations also from New York, Leroy Holding Company, Inc. and SLC Transport, Inc. Do you know any of the parties to this case?
 - a. If you know any of the parties to this case, please name the party or parties that you know and how you know that party or parties?
 - b. If you know any of the parties to this lawsuit, then does your knowledge of a party to this case make it impossible for you to be fair to both sides and to judge the evidence presented to you without any bias to either the plaintiff or the defendants?
2. The Plaintiff's attorney is Samuel M. Radner from the Haymond Law Firm in Hartford, Connecticut; and the Defendants' attorney is Kevin Murphy from Pessolano, Dusel, Murphy and Casartello, a law firm located in Springfield, Massachusetts. Do you know any of the attorneys who represent the parties in this case?
 - a. If you know any of the attorneys, please name the attorney and explain how you know the attorney.

- b. If you know any of the attorneys who represent the parties to this lawsuit, then does your knowledge of an attorney or their office make it impossible for you to be fair to both sides and judge the evidence presented to you without any bias to either the plaintiff or defendants?
- 3. Have you or anyone you have known been involved in a motor vehicle accident?
 - a. If so, please provide a brief explanation of the accident and your involvement or knowledge of it?
 - b. Is there anything about your experience with respect to being involved or knowing someone who was involved in a motor vehicle accident which would make it impossible for you to be fair and impartial to both the plaintiff and defendant in this case?
- 4. Have you ever driven a tractor trailer truck or known someone who has?
 - a. If you have driven a tractor trailer truck, or known someone who has driven a tractor trailer truck, would you be able to fairly and without prejudice or bias listen to the evidence in this case if the evidence showed you that one of the parties either operated or owned a tractor trailer truck?
- 5. Have you known someone who was killed as a result of a motor vehicle accident? If the answer is yes, then please tell us the following:
 - a. When was the accident?
 - b. As a result of that incident, did you or the family of the person who died bring a lawsuit?
 - c. Was the case settled or tried?
 - d. Were you, your family or the family of the deceased satisfied with the outcome?
 - e. If you have known someone who was killed as a result of a motor vehicle accident, then is there anything about your experiences with that incident that may biased towards either the plaintiff or the defendants in this case?
- 6. Do you feel that there are too many lawsuits?
 - a. If so, why?
 - b. Does your feeling impair your ability to be fair and impartial to the Plaintiff and Defendants in this case?
- 7. How do you feel about a lawsuit for financial compensation brought by someone who has been seriously injured?
 - a. Does your feeling impair your ability to be fair and impartial to the Plaintiff and Defendants in this case?

8. How do you feel about monetary compensation to family members for the death of their son caused by another?
9. How would you feel about awarding financial compensation for the loss of care, comfort, support, companionship and society of a son or daughter who has been killed?
10. After you listen to all of the evidence in this case, and based upon the law which His Honor will instruct you on, you find that the Plaintiff is entitled to a verdict, would you hesitate to return a verdict which fully and completely compensates the Plaintiffs for all of the losses suffered as a result of the death of their son?
 - a. And if you analyze the evidence with respect to each element of the Plaintiff's damages, and you determine an amount which would fairly compensate each parent for each element of their damages, would you hesitate to return a verdict for the total of all those elements of damages simply because, when you add them all up, they will constitute a substantial amount of money?
 - b. In other words, if you find that the plaintiffs are entitled to a verdict in this case, and you analyze the funeral and burial expenses incurred, and you determine what those damages are, and you then turn to the element of damages for loss of their son for the loss of the care, the comfort, society, and affection from the time of death and into the future, and after having determined what a fair and just award would be for each element of those damages, would you return with a verdict that equaled the total of all of those elements of damages, or would you consider awarding the plaintiffs something less than they each are entitled to, something less than the total of all of those elements, just because when you add them all up, it will be a very substantial monetary award?

Respectfully submitted,
By the Plaintiff,
The Estate of Jose R. Feliciano



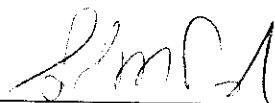
Samuel M. Radner, Esq.
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Hartford, CT 06105
(860) 728-5672
BBO # 565988
Plaintiffs Attorneys

Dated: 4/25/05

CERTIFICATION

I, Samuel M. Radner, Esquire hereby certify that a copy of the foregoing was mailed postage pre-paid to the following counsel and pro se parties of record on April 25, 2005:

Kevin G. Murphy, Esquire
Pessalano, Dusel, Murphy & Casartello, P.C.
115 State Street, 5th Floor
Springfield, MA 01103



Samuel M. Radner, Esquire